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8 Of Attorneys for Defendant  
9 Karla Padilla-Reyna  
10

11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF WASHINGTON  
13

14 UNITED STATES OF AMERICA  
15 Plaintiff,  
16

17 vs.  
18

19 KARLA L. PADILLA-REYNA,  
20 Defendant.  
21

22 Case No. 22-cr-2059-MKD-1  
23

24 MOTION TO FOR WITHDRAWAL OF  
25 COUNSEL AND FOR APPOINTMENT  
26 OF NEW COUNSEL  
27

28 MOTION

COMES NOW the defendant, Karla L. Padilla-Reyna, through her attorney,  
Robin C. Emmans, and moves this court for an order allowing the withdrawal of  
current counsel and for the appointment of counsel.

MEMORANDUM

After her sentencing on May 16, 2023, Ms. Padilla had questions and concerns for counsel about the sentencing hearing itself and the court's judgment. She immediately began to seek the assistance of other counsel for advice. Current counsel assisted in making two specific recommendations, both of which were unavailable to Ms. Padilla. Her other calls similarly have been fruitless. At the time of filing this motion, Ms. Padilla has been unable to locate replacement counsel. Her deadlines for filing for relief are fast approaching. One of the issues on which she will need advice is that of effective assistance of counsel, and this is why current counsel seeks withdrawal and the appointment of either the Federal Defenders' Office or CJA panel representation. There should be no issue of conflicts of interest with the Federal Defenders' Office, as current counsel was retained rather than appointed. The urgency of the matter, the nature of the analysis which needs to be done, and the unavailability of other counsel makes withdrawal and appointment of other counsel the most effective and most practical means by which Ms. Padilla might obtain sound advice on her options and then make a timely decision on any course of action.

CONCLUSION

For the foregoing reasons, defense counsel requests permission to withdraw and requests that appointment of new counsel be made as soon as possible for the

1 purpose of advising Ms. Padilla on whether or not to pursue any avenue of relief from  
2 judgment.

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4 DATED: May 24, 2023

5 /Robin C. Emmans  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2023, I electronically filed the foregoing with  
the Clerk of the Court using the CM/ECF System which will send notification of such  
filing to the following: SAUSA Frieda K. Zimmerman, AUSA Tyler Tornabene, and  
AUSA Dan Fruchter.

s/ Robin Emmans  
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